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CH2M HILL

TECHNICAL STATUS REPORT

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DATE: August 4, 1995

SUBJECT: Rhône-Poulenc Monthly Status Report

SITE NAME AND LOCATION: Rhône-Poulenc Inc./Seattle Plant
Tukwila, WA

REPORTING PERIOD: July 1 through July 31, 1995

PROJECT: 106063.P1

Following is CH2M HILL's technical status report summary for the RCRA Corrective Action Project at Rhône-Poulenc's (RP) Seattle Plant. This status report summarizes activities implemented and planned for this Corrective Action project and is intended to be transmitted to U.S. EPA Region 10 in fulfillment of the monthly progress reports required in Consent Order No. 1091-11-20-3008(h).

Progress Made This Reporting Period

Task P1-Project Management

Sylvia Burges/EPA 10, Rene Fuentes/EPA 10, Neil Morton/PRC (EPA's risk assessment contractor), Byung Maeng/Ecology, Teresa Michelsen/Ecology, Edwin Liu/RP, Paul Nemanic/RP, Betsy Carlton/RP, Sue Hays/Hays Consulting, Lisa Dally Wilson/Dally Environmental, Doug Holsten/CH2M HILL, and Liz Luecker/CH2M HILL met on July 25 at 9:30 at Bogle & Gates. RP and CH2M HILL presented the Round 3 groundwater data, seep and surface water data, and sewer sediments data. The Risk Assessment/MCS assumptions were also discussed in this meeting.

EPA and Ecology agreed that the seep sample data would only be compared to surface water criteria and not groundwater criteria. Round 3 groundwater data will be compared to surface and groundwater criteria as was done in the RFI. Some of the data quality issues were also discussed in this meeting.

EPA and Ecology agreed that the Risk Assessment/MCS will be based on an industrial scenario, the Sediment Management Standards will be used as media cleanup standards, and the 100x rule from MTCA will be used to screen whether soil could leach to groundwater at concentrations that could be of concern. If the 100x rule indicates that soil may be a concern, EPA agreed that additional evaluations (e.g. leaching tests) would be done in the CMS. Minutes of this meeting will be issued by CH2M HILL by August 18.

Task A2-Applicable Regulations and Permits

Leasing Arrangements.

Segale completed asphalting in most of Phases 2 and 3 on July 24. Two new catch basins were added. These areas are now being used by Northwest Container.

During July, several sinkholes appeared in various areas of the facility where the containers were being managed. These areas include an area near East Marginal Way (more gravel was added to fill the sinkhole), south of the old compressor building location, and about 50' north where a section of the road sank approximately 1 foot. Buzz Rahier/RP was concerned that the container mover may have crushed the King County Storm Drain, so he had Kohl Excavating come out on July 29 to excavate these last two areas. The drain was still intact; however, apparently the sand and silt underlying these areas had never been fully compacted. The areas were filled with 3" ballast rock and topped with a layer of 1/4" minus gravel. The road will be resurfaced in August.

Storm Water Discharges.

The semiannual NPDES discharge report was filed with Ecology on July 13. The report stated that the valve to the river was closed for the entire period.

METRO Discharges.

METRO issued minor discharge authorization number 513 to Northwest Container on July 11; this authorization expires on July 11, 2000. Northwest Container is authorized to discharge a maximum of 1,500 gpd of treated wastewater to the METRO sewer.

Sewer Lines.

On 7/6 two additional sewer sediment samples were collected from the lines up-gradient from where the outfall 2 sample was taken. The samples were sent to the S-Cubed laboratory for PCB analyses. Arochlor 1254 was detected in these two samples at concentrations of 64.5 ppm and 13,800 ppm.

Sediment removed from the sewers during clean out is currently being profiled by Philip Environmental for disposal at Chemical Waste Management's hazardous waste landfill in Arlington, Oregon. We are currently awaiting the results of the total copper analysis. These results will determine whether fish toxicity should be done.

Due to the high PCB concentrations in the sewer sediment, the exposed piping of stormwater outfall 2 was barricaded off with plastic tape and will be covered to prevent accidental exposure.

The sediments in most of the sewers were cleaned out the first week of July by Ventilation Power. All lines were cleaned out except for two manholes leading to outfall 7, one catch basin across from the change house, one catch basin south of the warehouse, and a manhole south of the maintenance building foundation.

As the lines were cleaned out, Buzz Rahier/RP grouted up the un-needed outlets and filled most of the un-needed catch basins with sand. Two that couldn't be compacted were filled with controlled density fill (CDF) instead; these were the sump pump in the old copper intercept area (sampled as 014-SEW) and the outfall 3 sample point. The wash water from line clean out was placed in a tank, the sediments are being allowed to settle out, and the supernatant is being pumped to a Rain-for Rent tank. The sludge is being stored onsite in a tank, and the supernatant is being pumped to the same Rain-for-Rent tank. The water will be tested for potential discharge to METRO; the sediments will be taken by Ventilation Power to Philip (formerly Burlington Environmental) for treatment and disposal. If the water does not meet the METRO discharge limits, it will also be sent to Philip for disposal.

Work on the sewer sediment sampling memorandum began in July. This memorandum may be combined with the Round 3 Technical Memorandum for submittal to EPA. As discussed with Sylvia Burges/EPA 10, the memorandum will address the sampling event and will also address clean out of the sewers.

Task A3-Interim Measures

PCB-Contaminated Compressor Pad.

The last of the excavation water was treated on July 1. The water met the METRO discharge requirements for toluene, chromium, and copper. However, the water contained about 200 ppb PCBs after 2 passes through the activated carbon. METRO was contacted to determine if they could accept the treated water; METRO sent a letter approving a one-time discharge of the treated water. Approximately 7,000 gallons of treated water was discharged to METRO from July 26 to July 28. One 20,000 gallon rented tank was decontaminated, tested and returned. The other tank was decontaminated on July 28; wipe samples were taken on July 31.

LNAPL.

As in June, very little LNAPL was present in the wells. Buzz Rahier/RP did not detect any measurable LNAPL. Because of other work (the lessee moved onto most of the site in July), Buzz was not able to perform any LNAPL monitoring except the monthly round of monitoring. He will try to monitor wells in the area of the toluene plume weekly for LNAPL in August. Oil globules were visible in the sample from MW-12; the only other well with LNAPL was H10 that had a sheen. The remaining wells surveyed did not contain LNAPL. Information on the LNAPL thicknesses is attached.

Three wells were not accessible to be monitored for LNAPL because containers were being stored on top of them. These wells were H11, DM4, and B1B.

Task A5-RFI Implementation

Discussions are still ongoing with the lab to resolve some of the data quality issues. In mid July, PACE notified RP and CH2M HILL that they were closing the MidPacific laboratory.

Task A8-Round 3 Technical Memorandum

Although the lab is still addressing data issues, preparation of the Round 3 Technical Memorandum has begun using the data that are available.

Task S1-Miscellaneous Field Support

See above Task A2, Sewer Lines, for a description of the additional sewer sediment sampling.

Hokkaido Drilling will be at the site starting August 14 to rehabilitate and raise the monitoring well heads to the elevation of the new pavement and gravel. The well heads will also be reinforced to withstand the loading expected by the container mover.

Deliverables Submitted

The June Progress Report was submitted to U.S. EPA on July 10, 1995.

A package of Round 3 data were delivered to U.S. EPA and Ecology on July 24, 1995 in preparation for the July 25 meeting.

Progress Planned For Next Reporting Period

Task A2-Applicable Regulations and Permits

Sewer Lines.

Ventilation Power will return the second week of August to clean out the remaining manholes and catch basins except for outfall 2. The wash water will be placed with the other sewer wash water.

The wash water will be tested for potential discharge to METRO; the sediments will be taken by Ventilation Power to Philip (formerly Burlington Environmental) for solidification and disposal at Arlington. If the water does not meet the METRO discharge limits, it will also be sent to Philip for disposal.

The sewer sediment sludge will be profiled and will be disposed of.

RP is evaluating what can be done with the outfall 2 line.

Task A3-Interim Measures

PCB-Contaminated Compressor Pad.

Pending results of the wipe test, the Rain-for-Rent tank is expected to be shipped back during the beginning of August. Approximately 130 gallons of wash water and sediment from tank cleaning await a decision on preparation for disposal. The filter carbon and recovered sediment will be sent to Aptus for incineration in August.

LNAPL.

Continue to monitor LNAPL thicknesses in monitoring wells. Buzz Rahier/RP will monitor wells H10, MW18, H1, MW12, H11, H9, H6, MW15, MW16, and MW19 weekly for the next month, depending on his workload. The remaining wells will be monitored monthly as they have been in the past.

Task A5-RFI Implementation

Preparation of the Round 3 Data Technical Memorandum will begin in early August, even if data issues discussed above cannot be resolved.

Task R1-Risk Assessment/proposed Media Cleanup Standards Report

The Risk Assessment/MCS report will be started once the draft Round 3 technical memorandum is submitted to EPA, estimated to be in mid to late September.

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